

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO:	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
ALL ETHICON WAVE 5 CASES	
<i>Virginia L. DuBois</i> <i>2:12-cv-08070</i>	

**UNOPPOSED MOTION FOR A FOURTEEN-DAY EXTENSION
OF TIME IN WHICH TO FILE ANY GENERAL *DAUBERT* MOTION
RELATED TO DEFENSE EXPERT ADAM STEINBERG**

Plaintiffs respectfully move this Court for an order of an extension of time in which to file any general *Daubert* motion against Ethicon's expert Dr. Adam Steinberg in the above captioned case. Dr. Steinberg has been designated as a general expert in the case listed in the caption for the first time since the beginning of the Wave process. Due to scheduling conflicts between Plaintiffs' counsel, defense counsel, and the witness, this deposition has to be scheduled outside of the discovery cutoff. The plaintiffs request/propose to schedule Dr. Steinberg's deposition on August 1, 2017, and Plaintiffs filed and served their deposition notice reflecting the date. As a result in these scheduling delays – none of which were intentionally caused by the parties or witness – the parties have agreed to amend the deadlines to file motions to exclude and/or limit the opinions of Ethicon's expert Dr. Steinberg as follows:

Daubert motion:

- Initial filings due August 29, 2017
- Responses due September 12, 2017
- Replies due September 19, 2017

Plaintiffs are not seeking these extensions for reason of delay or for any other improper purpose but, rather, only seek these extensions in good faith to accommodate Ethicon and its experts.

WHEREFORE, Plaintiffs request that the Court grant the requested extensions, moving the due dates to the dates listed above.

Dated: July 25, 2017

Respectfully submitted,

/s/ Bryan F. Aylstock

Bryan F. Aylstock, Esq.

Renee Baggett, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

rbaggett@awkolaw.com

baylstock@awkolaw.com

/s/Thomas P. Cartmell

Thomas P. Cartmell, Esq.

Jeffrey M. Kuntz, Esp.

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

tcartmell@wcllp.com

jkuntz@wcllp.com

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on July 25, 2017, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/Bryan F. Aylstock
Attorney for Plaintiffs